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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEANU JACKSON,

Defendant.

CASE NO. **CR 25-70466-MAG**
NOTICE OF PROCEEDINGS ON OUT-OF-
DISTRICT CRIMINAL CHARGES PURSUANT TO
RULES 5(c)(2) AND (3) OF THE FEDERAL
RULES OF CRIMINAL PROCEDURE

Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure
that on April 21, 2025, the above-named defendant was arrested pursuant to an arrest warrant (copy
attached) issued upon an

X Indictment

pending in the Southern District of Georgia, Case Number 2:24CR-10.

A copy of the indictment is attached.

Description of Charges:

Defendant KEANU JACKSON is charged via indictment with:

Count 1: 18 U.S.C. § 1349 Conspiracy to Commit Bank Fraud

Count 2: 18 U.S.C. § 1344 Bank Fraud

1 The maximum penalties are as follows:

2 Count 1:

- 3 • Maximum prison term of thirty (30) years
- 4 • Maximum \$1,000,000 fine
- 5 • Maximum supervised release term of five (5) years
- 6 • \$100 special assessment

7 Count 2:

- 8 • Maximum prison term of thirty (30) years
- 9 • Maximum \$1,000,000 fine
- 10 • Maximum supervised release term of five (5) years
- 11 • \$100 special assessment

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14 Respectfully Submitted,

15 PATRICK D. ROBBINS
16 Acting UNITED STATES ATTORNEY

17 Date: April 21, 2025

18 /s/
19 TAYLOR LORD
20 Special Assistant United States Attorney

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FILED
John E. Triplett, Clerk of Court
United States District Court
By James Burrell at 12:35 pm, Dec 04, 2024

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

UNITED STATES OF AMERICA)	INDICTMENT NO.	2:24CR-10
)		
v.)	18 U.S.C. § 1349	
)	Conspiracy	
KEANU JACKSON)		
)	18 U.S.C. § 1344	
)	Bank Fraud	

THE GRAND JURY CHARGES THAT:

COUNT ONE
Conspiracy to Commit Bank Fraud
18 U.S.C. § 1349

1. Beginning at least in or about November 2022 and continuing thereafter until on or about the date of the Indictment, the exact date being unknown to the grand jury, in Camden County, within the Southern District of Georgia and elsewhere, the Defendant,

KEANU JACKSON,

with A.H. and other co-conspirators, known and unknown, did conspire, confederate, and agree with each other to commit bank fraud, that is, to knowingly execute or attempt to execute a scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property under the custody and control of a financial institution by means of false and fraudulent pretenses, representations, and promises, all in violation of Title 18, Section 1344 of the United States Code.

Object of the Conspiracy

2. It was the object of the conspiracy for **KEANU JACKSON, A.H.,** and others to unlawfully enrich themselves by, among other things, cashing and

depositing fraudulent checks.

Manner and Means of the Conspiracy

3. It was part of the conspiracy, and the manner and means hereof, that **KEANU JACKSON** would obtain checks made payable to someone other than **KEANU JACKSON**, and then provide those checks with the name of the payee altered to individuals known to **KEANU JACKSON**, including A.H.

4. With the altered check that identified individuals known to **KEANU JACKSON** as the payee, the individuals would then negotiate the checks at a financial institution and deposit the funds into their accounts.

Overt Acts

5. As part of the conspiracy, on or about November 1, 2022, **KEANU JACKSON** obtained a check issued by Company 1 in the amount of \$72,523.06.

6. Company 1 did not list **KEANU JACKSON** or A.H. as the payee on the check.

7. **KEANU JACKSON** provided the check to A.H. with A.H. as the payee.

8. A.H. agreed to deposit the altered check into A.H.'s bank account.

9. On or about November 7, 2022, A.H. negotiated the altered check at Financial Institution 1, the deposits of which were then insured by the National Credit Union Share Insurance Fund, located at Kings Bay, within the Southern District of Georgia, and deposited the funds into A.H.'s account with Financial Institution 1.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

Bank Fraud

18 U.S.C. § 1344 and § 2

10. Paragraphs 1 through 9 of the Indictment are incorporated by reference as if fully set forth herein.

11. On or about November 7, 2022, in Kings Bay, Georgia, within the Southern District of Georgia and elsewhere, the Defendant,

KEANU JACKSON,

aided and abetted by A.H. and others known and unknown to the Grand Jury, did knowingly execute a scheme and artifice to defraud, and obtain money and property, owned by, or under the custody or control of, Financial Institution 1, the deposits of which were then insured by the National Credit Union Share Insurance Fund, by means of materially false and fraudulent pretenses, representations, and promises.

The Scheme and Artifice

12. It was part of the scheme and artifice that members of the conspiracy would obtain checks payable to someone other than the members of the conspiracy and then provide those checks with the payee altered to members of the conspiracy.

13. It was further part of the scheme and artifice that members of the conspiracy would then negotiate those checks at a financial institution.

14. On or about November 7, 2022, within the Southern District of Georgia, **KEANU JACKSON**, aided and abetted by A.H., for the purpose of executing the scheme described above, and attempting to do so, knowingly presented the following forged and fraudulent check to be cashed or for deposit into various bank accounts and aided and abetted others in doing so:

Approximate Date	Fraudulent Check
November 7, 2022	Check # 48275 for \$72,523.06 drawn on account of Company 1 from Financial Institution 2 made out to A.H. and deposited into Financial Institution 1 account in the name of A.H.

All in violation of Title 18, United States Code, Sections 1344(2) and 2.

FORFEITURE ALLEGATION

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).


Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1344 and 1349 set forth in Counts One and Two of this Indictment, Defendant **KEANU JACKSON** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation.

If any of the property described above, as a result of any act or commission of the Defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).


A True Bill



Jill E. Steinberg
United States Attorney



Ryan C. Grover
Assistant United States Attorney
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Tania D. Groover
Assistant United States Attorney
Chief, Criminal Division

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

United States of America

v.

KEANU JACKSON

2521-1205-0196-3
Case No. 2:24CR-10

FID# 11744364

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) KEANU JACKSON,

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1349 CONSPIRACY TO COMMIT BANK FRAUD

Date: 12/05/2024City and state: SAVANNAH, GEORGIA

Issuing officer's signature

JOHN E. TRIPLETT, CLERK OF COURT

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title